



Arkansas Department of Health

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Governor Mike Beebe
Paul K. Halverson, DrPH, FACHE, Director and State Health Officer

April 14, 2010

Re: Amendment of Part 97 of the Commission's Rules Regarding Amateur Radio Service
Communications during Government Disaster Drills -- WP Docket No. 10-72

Commissioners,

With the possible threat of a major earthquake in the New Madrid Seismic Zone, the emergency plans in the State of Arkansas expect a wide area disruption of the communications infrastructure to occur. The proven ability of the ham radio volunteers to establish a working point to point communications network in the complete absence of that infrastructure is an essential element of our disaster planning. Ham radio has repeatedly proven itself as the ultimate "safety net" or backup communications system for the hospitals around the State of Arkansas to maintain contact with State and County officials during emergencies when every other communication system has failed.

The current wording of FCC rules, Part 97.113(a)(3) does not allow hospital employees who are also licensed amateur radio operators to participate in training exercises that will allow them to develop the required operating skill set for this type of emergency situation. During the first few hours of a major emergency the hospital employees will be the only operators in place at the hospital to provide the communication support that is so critical to recovery efforts. Reasonable expectations would be that outside volunteers will not be able to respond to provide this communication service until they have first secured the safety of their own families and property.

It is generally accepted that in an actual emergency, when other communication systems are unavailable, these "employee operators" can and will make use of ham radio for communications in support of the hospital mission. By not allowing these operators to train for this possible event the utility of the communication tool that is provided by ham radio is seriously compromised.

For the reasons stated above, The Arkansas Department of Health believes it would serve the greater public interest to modify the wording of Part 97 of the Commission's rules so as to allow the participation of Public Safety Agency employees in recognized and scheduled communication exercises or drills.

We further suggest that the language of the proposed revision to Part 97 should be broad enough to clearly and unambiguously include the licensed ham radio operators who are employees of other recognized disaster response organizations such as privately owned hospitals, The Red Cross, The Salvation Army, and not just Federal, State, and Local government agencies. These groups need to also be participating in these same emergency training exercises, as these operators represent the other end of the communication links that will be essential for recovery efforts during an actual emergency.

Sincerely,

Paul Halverson, DrPH, FACHE
Director and State Health Officer

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